## Case 2:16-cv-01688-JAD-PAL Document 15 Filed 12/13/16 Page 1 of 2 Marc V. Kalagian 1 Attorney at Law: 4460 Law Offices of Rohlfing & Kalagian, LLP 211 East Ocean Boulevard, Suite 420 Long Beach, CA 90802 Tel.: (562)437-7006 4 Fax: (562)432-2935 E-mail rohlfing.kalagian@rksslaw.com 5 Attorneys for Plaintiff THOMÁS I. WATANABE 6 7 UNITED STATES DISTRICT COURT 8 **DISTRICT OF NEVADA** 9 10 THOMAS I. WATANABE, Case No.: 2:16-cv-01688-JAD-PAL 11 STIPULATION TO EXTEND Plaintiff, 12 **BRIEFING SCHEDULE** 13 VS. 14 15 CAROLYN W. COLVIN, Acting Commissioner of Social Security, 16 17 Defendant 18 19 Plaintiff Thomas I. Watanabe ("Plaintiff") and defendant Carolyn Colvin, 20 Acting Commissioner of Social Security ("Defendant"), through their undersigned 21 counsel of record, hereby stipulate, subject to the approval of the Court, to extend the time for Plaintiff to file Plaintiff's Motion for Reversal and/or Remand to 22 23 February 6, 2017; and that Defendant shall have 30 days or until March 8, 2017, to 24 file her opposition, if any is forthcoming. Any reply by plaintiff will be due March 25 29, 2017. 26

## Case 2:16-cv-01688-JAD-PAL Document 15 Filed 12/13/16 Page 2 of 2

1	An extension of time is needed in order to properly address the issues within	
2	the administrative record in this matter. Counsel sincerely apologizes to the court	
3	for any inconvenience this may have had upon it or its staff.	
4		
5	DATE: December 6, 2016	Respectfully submitted,
6		ROHLFING & KALAGIAN, LLP
7		(
8	ВУ	/s/Mare V. Kalagian Z:
9		Marc V. Kalagian Attorney for plaintiff THOMAS I. WATANABE
10		
11	DATED: December 6, 2016	Daniel G. Bogden
12		United States Attorney
13		*/S/ Marcelo N. Illarmo
14		
15		Marcelo N. Illarmo
16		Special Assistant United States Attorney Attorney for Defendant
17		[*Via email authorization]
18		
19		
20		IT IS SO ORDERED:
21		
22		UNITED STATES MAGISTRATE JUDGE
23		
24		DATED: December 13, 2016
25		
26		